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Preliminary Comments in the RETI 2.0 Process_TANC

see attached file

Additional submitted attachment is included below.



Preliminary Comments in the RETI 2.0 Process November 16, 2015

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide these preliminary comments on the proposed Renewable Energy Transmission Initiative (RETI) 2.0 process. TANC was formed in 1984 as a joint powers authority to plan and develop transmission facilities in a coordinated manner for our 15 publicly-owned utility (POU) Members. It is TANC's mission to assist its POU Members in providing cost-effective energy supplies to their customers, through long-term ownership or contracts for service over highvoltage transmission lines within California and the western United States. TANC is the project manager of the California-Oregon Transmission Project (COTP) a 340-mile 500-Kilovolt (kV) alternating current (AC) transmission line between Southern Oregon and Central California. The COTP is a prime example of coordinated joint inter-regional transmission planning. The COTP Participants, California utilities, and parties in the Pacific Northwest spent considerable time and efforts in the planning, study, and ultimate development of the COTP and the third Northwest Intertie in the Pacific Northwest. The COTP and the other 500-kV facilities in California (the Pacific AC Intertie) comprise the California-Oregon Intertie which is critical for promoting interstate commerce, the bi-directional transfer of clean and economic energy, and will be critical for meeting California's future energy goals.

TANC was an active participant in both the initial RETI that began in 2007 and the California Transmission Planning Group (CTPG) that was formed from the RETI process. TANC anticipates being a collaborative partner and active participant in RETI 2.0. TANC wishes to stress the importance for RETI 2.0 to consider diversity in the location of future renewable projects and the required transmission facilities that may be required. The evolving California electricity marketplace is seeing an increase in congestion on transmission paths between the Pacific Northwest and California and between southern California and northern California. A strategy to promote renewable and/or transmission development that addresses these conditions is essential.

When considering a statewide or a regional planning effort to meet renewable energy goals, TANC strongly believes that it is critical to optimize existing transmission lines and corridors first. In the process of exploring combinations of renewable generation resources in California and throughout the West that can best meet renewable energy goals, the location and utilization of existing transmission lines and corridors must be given priority, including the protection and enhancement of existing paths.

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In addition, while the California Independent System Operator (CAISO) and other balancing authority areas (BAAs) involvement is important in the development of identifying statewide or regional solutions to meet renewable energy goals; it is also important that that POUs and transmission owners (TOs) become active participants in the process and should be included in the transmission technical input group. While the regional aspects of planning continue to be important, it is the POUs and TOs that need to pay attention to what occurs at the local level.

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